

Exhibit D

Proposed Order

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

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In re:

Chapter No. 11

OAK ROCK FINANCIAL, LLC,

Case No. 8-13-72251-REG

Debtor

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**ORDER GRANTING AMENDED FINAL FEE APPLICATION OF PERKINS COIE LLP
FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES**

This matter is before the Court on the *Amended Final Application of Perkins Coie LLP for Compensation and Reimbursement of Expenses* (the “**Amended Application**”) [DE ____], to approve pursuant to Bankruptcy Code § 330 and Bankruptcy Rule 2016(a) Perkins Coie’s compensation for June 4, 2014 through October 31, 2018 (the “**Application Period**”) and reimbursement of the actual out-of-pocket expenses Perkins Coie advanced in this case during the Application Period plus an estimated \$75,000 for fees and expenses for November and December 2018.

IT IS ORDERED that pursuant to Bankruptcy Code § 330, the Amended Application is APPROVED, including the agreement of Perkins Coie LLP to accept \$5,325,000 as compensation for fees and expenses incurred in this case.

IT IS FURTHER ORDERED THAT, consistent with the Mediation Agreement, Perkins Coie shall be paid the sum of \$5,325,000 as compensation for fees and expenses incurred in this case and commercially reasonable efforts shall be made to indefeasibly pay such sum in collected funds (by wire transfer or check) to be received by Perkins Coie no later December 31, 2018. In all events, such payment shall be indefeasibly paid in collected funds to be received by Perkins Coie on or before January 31, 2019.